Applicant: Todd R. Wagner et al. Attorney's Docket No.: 12587-019001 / 01343-00/US

Serial No.: 10/014,840 Filed: October 22, 2001

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## REMARKS

Claims 1-41 are pending. Claims 1-41 have been rejected under 35 USC 103(a) as being unpatentable over MarketFirst Announces Initial Customer availability of MarketFirst Release 2.0 (Hereinafter the MarketFirst publication) in view of US Patent no. 6,334,110 B1 issued to Walter et al. (Hereinafter the Walter patent).

The examiner acknowledges that the MarketFirst publication does not teach all of the features of the applicant's claim. However, the applicant maintains that there is a greater difference between the MarketFirst publication and the applicant's claim 1. Claim 1 is not directed to the general idea of displaying information at varying degrees of detail. The applicant's claim 1 is limited to the display of "at least two respective role portals corresponding to at least two of the marketing roles within the marketing organization."

In the office action, the examiner refers to general comments related to various people using the MarketFirst system to provide a basis for the respective role portals corresponding to at least two of the marketing roles in the applicant's claim 1. The MarketFirst publication, however, does not make a distinction between the role of a user and the information the user receives. The MarketFirst publication describes a system in which:

"users and marketing managers can review programs that are in any phase of development or implementation. Campaigns can be grouped by criteria such as type or target market and <u>reviewed at any level of detail</u> to ensure effective, well-timed execution." (Emphasis added, page 2, lines 17-22)

As described above, the MarketFirst publication makes no distinction between the information and level of detail viewed by the user and the manager. The mere existence of users having various roles in the organization using the MarketFirst system does not describe a system the provides portals corresponding to the marketing role. In addition, the MarketFirst publication seems to teach away from providing information based on marketing roles and describes that:

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"marketing professionals can design interactive web pages that are personalized in real-time to a prospect or customer's <u>individual needs</u>" (page 2, lines 32-34).

As described above, the MarketFirst system provides a level of detail on an individual basis tailored to the needs of the individual, not tailored to a particular marketing role of the individual. In addition, the described personalization based on individual needs is for a prospect or customer not for someone in a marketing role.

For at least this reason, we submit that claim 1 is patentable over the MarketFirst publication. We further submit that because claims 2-17 depend from claim 1, these dependent claims are patentable for at least the same reasons that independent claim 1 is patentable.

Claim 18 and 29 include a similar limitation to claim 1 of "a role portal component for providing at least two respective role portals corresponding to at least two of the marketing roles within the marketing organization" and are patentable for at least the reasons discussed above. Dependent claims 19-28 and 30-39 should be allowable for at least the same reasons as the claim on which they depend.

Claims 40 and 41 are dependent on claim 18 and 19 and recite a system "wherein access is restricted to the marketing role of the user as defined by role information of the user." The examiner contends that

"presenting personalized web pages are per user's {prospect or customer's} individual needs" clearly indicating the provision of obtaining or accessing information limited or restricted to (personalized) specific users included cited Marketing Manager, sales force personnel etc. (Page 2, lines 7 and 43-46) and the status or role of said users and type or extent of information they would obtain or access ought to have been assigned or defined.

The applicant disagrees with the examiner's reasons. First, the personalized web pages to which the examiner refers are described in relation to personalization for a prospect or customer not to a marketing role. In addition, there is no indication that this personalization limits the information available to the user. The presentation of information at varying levels of detail is also described on page 2, lines 20 and 21 which describes that the information can be "reviewed"

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at any level of detail" and does not suggest restricting the access based on the marketing role of the individual.

The applicant asks that all claims be allowed.

The fact that the applicant has addressed certain comments of the examiner does not mean that the applicant concedes any other positions of the examiner. The fact that the applicant has asserted certain grounds for the patentability of a claim does not mean that there are not other good grounds for patentability of that claim or other claims.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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Date: February 24, 2004

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